

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

TALISA BORDERS

and

OTISHA WOOLBRIGHT

On behalf of themselves and all others similarly  
situated,

Plaintiffs,

vs.

WAL-MART STORES, INC.,

Defendant.

CIVIL NO. 3:17-CV-00506-MJR-DGW  
Judge Michael J. Reagan

**MOTION OF WAL-MART STORES, INC.'S TO DISMISS  
THE COMPLAINT FOR FAILURE TO STATE A CLAIM**

Wal-Mart Stores, Inc. ("Wal-Mart") moves this Court to dismiss the Complaint for failure to state a claim pursuant to Federal Rule of Civil Procedure 12(b)(6). In support thereof, Wal-Mart submits the accompanying Memorandum of Law.

July 31, 2017

Respectfully submitted,

By: /s/ Andrew G. Klevorn

Andrew G. Klevorn (Lead Counsel),

*admission pending*

Stacey M. Knight, *pro hac vice*

Andrew J. Demko, *pro hac vice*

Abimbola O. Oladokun,

*admission pending*

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*Attorneys for Defendant Wal-Mart Stores, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2017, I caused a true and correct copy of the foregoing to be served upon counsel of record via the ECF system.

July 31, 2017

/s/ Andrew G. Klevorn